APPLICATION TO EMPLOY ACCOUNTANT

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#### 1. PROCEDURAL HISTORY

On April 14, 2024, Debtors filed a petition for bankruptcy under Chapter 7 of Title 11 (the "Petition Date"). Charles W. Daff was appointed as Chapter 7 Trustee.

### 2. SERVICES TO BE PERFORMED

Applicant proposes to employ Hahn Fife & Company, LLP ("Hahn Fife" or the "Firm") pursuant to Section 327(a) to provide accounting services to the bankruptcy estate that include valuation and assistance in sale of Debtors' interest in commercial leased vehicles, the collection and servicing of the leases as accounts receivable by hiring the bookkeeper of the debtor, the appraisal of value for the liquidation of leases, review and analyze the accounting records for avoidable transfers, preparing and filing necessary state and federal estate tax returns, review of financial documents and any other reasonable duties assigned by the Trustee.

### 3. **QUALIFICATIONS OF THE FIRM**

As indicated by the attached Declaration of Donald T. Fife (the "Fife Declaration"), Hahn Fife is experienced in bankruptcy accounting matters, including those involving trustees, bankruptcy estates, and tax matters included in bankruptcy estates. The firm is competent to perform the requisite accounting services in this case. The members' breadth of experience and length of service is described in the resumes copies of which are attached as Exhibit "1."

#### 4. THE FIRM IS DISINTERESTED

- 1. Except as disclosed herein and to the best of the Firm's knowledge, neither the Firm, nor any of the attorneys comprising or employed by it, has any connection with the Debtor or the Debtor's attorneys or accountants, the Debtor's creditors, or any other outside party in interest, or their respective attorneys or accountants.
- 2. Based on the foregoing, the Trustee believes that the Firm is a "disinterested person" within the meaning of Bankruptcy Code Section 101(14).

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3. The Firm does not have an interest adverse to the Debtors or the bankruptcy Estate. As of the Petition Date, the Firm was not a creditor of the Estate and was not owed any funds by the Debtors.

To the best of the Firm's knowledge, and as set forth in the attached Fife Declaration, none of the attorneys comprising or employed by the Firm are related to any judge of the United States Bankruptcy Court for the Central District of California, the United States Trustee, or any person currently employed in the Office of the United States Trustee.

#### 5. COMPENSATION PROCEDURE

Applicant proposes to retain Hahn Fife upon the following basis: Except as the Court may otherwise determine, after due notice, Hahn Fife will petition the Court under 11 U.S.C. Sections 330 for an allowance of fees and reimbursable costs not more often than every 120 days. The petition will be heard upon notice to necessary parties. Hahn Fife will accept compensation and reimbursements of expenses in such amounts that the Court may award. There will be no written employment agreement apart from this Application. The only source of payment or compensation will be the estate. No retainer has been paid or is being proposed to Hahn Fife.

The Firm has advised the Trustee that the Firm has not shared or agreed to share any compensation to be received by it in this case with any other person, except as among partners of the Firm.

### 6. CONCLUSION

Trustee respectfully requests an order: (1) authorizing the employment of Hahn Fife as accountants with an effective date of May 28, 2025, as an administrative expense of the estate upon the terms and conditions in this application; (2) granting for such other and further relief as is just and proper.

| Case ( | :25-bk-12346-SY   | Doc 13 Filed 05/28/25 Entered 05/28/25 13:03:27 Desc<br>Main Document Page 4 of 16 |
|--------|-------------------|--|
| 1      |                   |  |
| 2      | Dated: 05/28/2025 | Respectfully submitted,  |
| 3      |                   | ву:  |
| 4      |                   | Charles W. Daff<br>Chapter 7 Trustee   |
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|        |                   | APPLICATION TO EMPLOY ACCOUNTANT   |

## **DECLARATION OF DONALD T. FIFE**

I, Donald T. Fife, declare as follows:

- 1. I am a duly-licensed certified public accountant in the State of California and a Partner in the firm of Hahn Fife & Company, LLP. I make this Declaration in support of the Trustee Application to Employ Hahn Fife in this case as the estate's accountant pursuant to 11 U.S.C. §372(a).
- 2. I have personal knowledge of the facts in this Declaration and, if called as a witness, could competently testify to these facts.
- 3. The firm is experienced in bankruptcy matters, including those involving trustees, bankruptcy estates, and issues relating to the tax effects from sale of estate assets. I am competent to perform the requisite accounting services in this case. The firm's breadth of experience and length of service is described in my resume, a copy of which is attached as Exhibit "1."
- 4. The firm is familiar with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules, and will comply with the Code and Rules.
- 5. I agree to the terms and conditions of employment in the foregoing application. I am willing to accept compensation and reimbursement of expenses in such amounts that the Court may award. I understand that my compensation may be modified under U.S.C. Section 330, if so warranted. No retainer has been paid or is being proposed to me.
  - 6. The Firm completed a conflict check prior to submitting this Application.
- 7. To the best of my knowledge, neither the Firm, nor any of the persons comprising or employed by it, has any connection with the Debtor or the Debtor's attorneys or accountants, the Debtor's creditors, or any other outside party in interest, or their respective attorneys or accountants.
- 8. The Firm is not and was not an investment banker for any outstanding security of the Debtor.
- 9. The Firm has not been within three (3) years before the date of the filing of the petition herein, an investment banker for a security of the Debtor, or an attorney for such

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Executed on May 24 , 2025, at Pasadena, California.

DONALD T. FIRE

## **DECLARATION OF CHARLES W DAFF**

I, Charles W. Daff, declare as follows:

- 1. I am a duly licensed attorney in the State of California, Bar No. 76178, and am qualified to serve as a Chapter 7 Trustee. I was appointed as the Chapter 7 Trustee in the above-captioned case following the Debtor's petition filing on April 14, 2024. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could competently testify to these facts.
- 2. Based on my preliminary review of the Debtor's business and assets, the bankruptcy estate requires specialized accounting services that are beyond the scope of routine trustee administration. The Debtor, Stoneway Capital Corporation, operated a commercial vehicle leasing business with complex financial arrangements that require professional accounting expertise to properly administer the estate and maximize recoveries for creditors.
- 3. The estate's accounting needs include valuation and assistance in the sale of the Debtor's interests in commercial leased vehicles. The Debtor maintained a portfolio of commercial vehicle leases that must be properly valued and liquidated to generate recoveries for the estate. This process requires specialized knowledge of commercial vehicle markets and lease valuation methodologies that exceed my expertise as Trustee.
- 4. The estate also requires collection and servicing of leases as accounts receivable, including the potential employment of the Debtor's former bookkeeper to assist in this process. The Debtor's lease portfolio represents a significant potential source of recovery for creditors, but proper collection requires specialized accounting knowledge and potentially forensic analysis of the underlying lease agreements and payment histories.
- 5. Professional accounting services are necessary to conduct appraisals of liquidation values for the lease portfolio and to review and analyze the Debtor's accounting records to identify potential avoidable transfers. Given the complexity of the Debtor's business operations and the potential for preferential transfers or fraudulent conveyances, specialized forensic accounting expertise is essential to protect the interests of the estate and its creditors.
  - 6. The estate will also require preparation and filing of necessary state and federal estate

tax returns, as well as ongoing review of financial documents and other accounting duties as required for proper estate administration. These tax compliance obligations require specialized knowledge of bankruptcy tax law and estate taxation that is beyond the scope of my duties as Trustee.

- 7. After considering the complexity of the estate's accounting needs, I determined that specialized bankruptcy accounting expertise was essential for proper administration of this case. I selected Hahn Fife & Company LLP based on their extensive experience in bankruptcy accounting matters, particularly involving trustees and bankruptcy estates.
- 8. Donald T. Fife, the principal of the firm, has over 30 years of experience in accounting, bankruptcy, turnaround, taxation, and fraud investigation. His background includes service with major accounting firms and specialized practice in bankruptcy, turnaround, and litigation support matters. The firm's expertise directly addresses the accounting needs of this estate, including asset valuation, forensic accounting, and tax services.
- 9. The firm has demonstrated familiarity with the Bankruptcy Code, Bankruptcy Rules, and Local Bankruptcy Rules, and has committed to comply with all applicable requirements. The proposed hourly rate of \$530.00 for Mr. Fife's services is reasonable given his level of expertise and the specialized nature of the services required.
- 10. Based on my investigation and the representations made by Donald T. Fife in his attached Declaration, I believe that Hahn Fife & Company LLP qualifies as a "disinterested person" within the meaning of 11 U.S.C. § 101(14). The firm has no connection with the Debtor, its attorneys, accountants, creditors, or other parties in interest that would create a conflict of interest or disqualify them from employment.
- 11. The firm was not a creditor of the estate as of the petition date and was not owed any funds by the Debtor. The firm does not hold any interest materially adverse to the estate or any class of creditors or equity security holders. The firm has completed a thorough conflict check and confirmed that no disqualifying relationships exist.
- 12. The employment arrangement proposed is reasonable and in the best interests of the estate. The firm will seek court approval for fees and expenses no more often than every 120

days pursuant to 11 U.S.C. § 330, with compensation limited to amounts approved by the Court.

The only source of payment will be the bankruptcy estate, and no retainer has been paid or is

compromise the firm's independence.

proposed.

13. The firm has represented that it has not agreed to share compensation with any other party except among its own partners. This arrangement ensures that the firm's loyalty remains with the estate and that there are no undisclosed compensation arrangements that might

- 14. The employment of Hahn Fife & Company LLP is necessary and in the best interests of the estate and its creditors. The specialized accounting services required exceed my capabilities as Trustee, and professional accounting expertise is essential to maximize recoveries for creditors through proper asset valuation and collection of receivables.
- 15. The firm's experience in bankruptcy matters will help identify and pursue potential avoidable transfers, which could result in significant recoveries for the estate. Additionally, proper tax compliance requires specialized knowledge that the firm possesses, and failure to obtain such expertise could expose the estate to tax liabilities that would reduce distributions to creditors.
- 16. The cost of professional accounting services is justified by the potential recovery benefits to the estate. Given the complexity of the Debtor's business operations and the specialized nature of the assets involved, professional assistance is necessary to ensure that the estate's assets are properly valued, collected, and liquidated for the benefit of creditors.
- 17. Based on the foregoing, I respectfully request that the Court authorize my employment of Hahn Fife & Company LLP as accountant for the bankruptcy estate, effective May 28, 2025, upon the terms and conditions set forth in the Application.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct executed on May 28, 2025, at Irvine, California.



Charles W Daff

**EXHIBIT 1** 

## Firm Statement of Qualifications

The Firm was formed in September of 2003 and provides accounting and consulting services relating primarily to bankruptcy, litigation, turnaround, fraud and receivership matters. The Firm's professionals have extensive experience and training in these specialized fields of accounting practice and have served a broad range of clients in Southern California for many years. Following are brief summaries of the qualifications of firm's current professional staff. It is expected that the Firm will add professional staff as required to serve client needs.

## Donald T. Fife, CPA

Mr. Fife currently practices exclusively in bankruptcy, turnaround and litigation consulting, providing services such as financial analysis, forensic accounting, tax services and expert witness testimony. He serves clients such as bankruptcy trustees, creditors, debtors, creditor's committees and parties to civil litigation.

Mr. Fife has over 30 years of business and financial experience in accounting, bankruptcy, turnaround, taxation and fraud investigation. He formerly practiced as an accountant and consultant with Price Waterhouse, FTI Policano & Manzo, PHB Hagler Bailly, Inc., Biggs & Company and Spicer & Oppenheim. Over the last 25 years, his career has been concentrated in the areas of bankruptcy, turnaround, and litigation support.

Mr. Fife is a Certified Public Accountant licensed in California. He is also a member of the American Institute of Certified Public Accountants, the California Society of CPA's, the National Association of Bankruptcy Trustees, the American Bankruptcy Institute, and the California Bankruptcy Forum. He received his bachelor's degree in Business Administration/Accounting from California State University at Los Angeles.

Hourly Rate: \$530.00

# RATES FOR REIMBURSEMENT OF INCURRED EXPENSES HAHN FIFE & COMPANY, LLP

| PHOTOCOPYING                      | \$0.10 PER PAGE                    |
|-----------------------------------|------------------------------------|
| TELECOPIER - INCOMING<br>OUTGOING | \$0.15 PER PAGE<br>\$1.00 PER PAGE |
| MILEAGE                           | \$0.27 PER MILE                    |
| TELEPHONE                         | ACTUAL COST                        |
| POSTAGE                           | ACTUAL COST                        |
| MESSENGER                         | ACTUAL COST                        |
| OVERNIGHT MAIL                    | ACTUAL COST                        |
| ON-LINE COMPUTER RESEARCH         | ACTUAL COST                        |
| FILING FEES                       | ACTUAL COST                        |
| DEPOSITION OR WITNESS FEES        | ACTUAL COST                        |
| PARKING                           | ACTUAL COST                        |

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 100 Spectrum Center Dr., Suite 600, Irvine, CA 92618

A true and correct copy of the foregoing document entitled: Notice of Motion for Order without Hearing Pursuant to LBR 9013-1(o): Trustee's Application to Employ Hahn Fife & Company LLP as Accounts with Proof of Service will be served or

was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below: 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 05/28/2025 | checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Lynda T Bui Ibui@shulmanbastian.com, ecf.filings@shbllp.com Charles W Daff (TR) charleswdaff@gmail.com, c122@ecfcbis.com Paul J Laurin plaurin@btlaw.com, slmoore@btlaw.com;jboustani@btlaw.com;jose.barajas@btlaw.com Michael G Spector mgspector@aol.com, mgslawoffice@aol.com United States Trustee (RS) ustpregion16.rs.ecf@usdoi.gov Service information continued on attached page 2. SERVED BY UNITED STATES MAIL: On (date) 05/28/2025 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed. Hon. Scott Yun, US Bankruptcy Court, 3420 Twelfth St., Riverside, CA 92501 X Service information continued on attached page 3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed. Service information continued on attached page I declare under penalty of perjury under the laws of the United States that the foregoing is 05/28/2025 **Charles W Daff** Date Printed Name Signature

Case 6:25-bk-12346-SY

Doc 13 Filed 05/28/25 Entered 05/28/25 13:03:27 Main Document Page 14 of 16

Employment Development Dept. Bankruptcy Group MIC 92E

P.O. Box 826880

Sacramento, CA 94280-0001

Franchise Tax Board

Bankruptcy Section MS: A-340

P.O. Box 2952

Sacramento, CA 95812-2952

Riverside Division

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Anderson Jr, Ernest 1237 Greystone Lane Pensacola, FL 32514-9568

Arnero, Miriam 431 L Thompson

0973-6

Riverside

Cedar Hill, TX 75104-5001

Label Matrix for local noticing

Central District of California

Wed May 28 12:51:06 PDT 2025 Stoneway Capital Corporation

San Rafael, CA 94903-2145

4310 Redwood Highway, Suite 200

Case 6:25-bk-12346-SY

Bohaichuk, Mykahilo 2421 Haydn St

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Bolanos, Hector 306 Huntington Drive Temple, GA 30179-6515

Bolanos, Luis 13955 Rincon Rd

Apple Valley, CA 92307-5650

Bruggenkamp, Linda 6372 Mormon Tea Way Reno, NV 89511-4382 Cajaraville, Sergio 19351 Grand Colony Katy, TX 77449-4566

Campos, Brandon 4900 N Grand Ave

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Castro Rubio, Gilberto 3810 Stathem St Riverdale, CA 93656-9233 Comcast 1701 JFK Blvd Philadelphia, PA 19103-2899

Contreras, Maria 1135 E Harvard Blvd Santa Paula, CA 93060-3723 Ervin Jr, Charles 3273 Cannes Ave Riverside, CA 92501-1241 Experian Credit Solutions 475 Anton Blvd Costa Mesa, CA 92626-7037

Franchise Tax Board

Bankruptcy Section, MS: A-340 Sacramento, CA 95812-2952

Franco, Daniel 11794 Vermont Ave Rancho Cucamonga, CA 91730-8291 Guerrero Ramos, Raymond 50 Prickly Pear Cactus Rd Glendale, AZ 85301

Hernandez, Martin 6603 Almeria Ave Fontana, CA 92336-1302 Huezo, Jimmey 12662 1/4 Bradley Ave Sylmar, CA 91342-4787 Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346

Jackson, Darron 6311 Kashmere St Houston, TX 77026-1627

Joya Alvarado, Jose 10401 Beckford Ave Porter Ranch, CA 91326-3303 Kellewood, Brandon 28 Road 5590 Farmington, NM 87401-1455

Linares, Jose 15889 Sueno Lane Victorville, CA 92394-1744

Loera, Jose 11109 S Avenue L Chicago, IL 60617-6916 Lopes Da Silva, Antonio 443 Hickory Course Loop Ocala, FL 34472-4392

## Case 6:25-bk-12346-SY

Martinez Maltez, Larry

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Mey, Channak 11115 Sawtooth Ct Adelanto, CA 92301-4620

Navarro, Margarito 795 E Calle Esplendor Nogales, AZ 85621-1445

Ortiz, Carlos 325 Jensen Road Newman, CA 95360-2714

Pedroso Frometa, Maykel 912 Duke Ave Odessa, TX 79765-2109

Post, Billy 13363 County Road 228 Bedias, TX 77831

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Rojas Barahona, Nancy 10112 SE Holgate Blvd Portland, OR 97266-2417

Sanchez Aquilar, Pedro 32753 S Verna St Woodburn, OR 97071-7700

Shaffer, Joseph 402 Free Timber Lane Stockdale, TX 78160-3213 Doc 13 Filed 05/28/25 Entered 05/28/25 13:03:27 Main Document Page 15 of 16

Mawire, Lovemore 1732 Valley View Lane Apt 1104 Irving, TX 75061-3525

Minor, Emmett 5225 Las Colinas Blvd Apt 3071 Irving, TX 75039-4569

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Perez Sandoval, Fabricio 17807 Lakecrest View Dr Cypress, TX 77433-3715

Quintanilla, Andrez 17841 Daffodil Hill St Lathrop, CA 95330-9367

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Roman Ocampo, Jose 5317 Mar Grande Drive Bakersfield, CA 93307-6979

Sanchez Calvillo, Hugo 9239 Pinyon Ct Fontana, CA 92335-5539

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Morton, Justin 10802 S Interstate 35 Apt 133 Austin, TX 78748

Olivares, Cesar 986 W La Alameda Ave San Pedro, CA 90731-2339

Patterson, James 3606 Edison Lane Rosharon, TX 77583-1200

Portillo Cruz, Marvin 7139 Hazeltine Ave Apt 213 Van Nuys, CA 91405-3277

Raimundo, Jesus 7749 Locust Ave Fontana, CA 92336-2836

Rivas Zambrano, Julio 225256 Hufsmith Kohrville Rd Tomball, TX 77375

Sabedra, John 9006 Ivy Spring Lane Houston, TX 77088-1829

Sandoval Crespo, Juan 348 N Muscat Ct Earlimart, CA 93219

Sosa Pineda, Rene 13854 Rayberry Street Victorville, CA 92392-0455 Case 6:25-bk-12346-SY

Doc 13 Filed 05/28/25 Entered 05/28/25 13:03:27

Main Document Page 16 of 16

Desc

United States Trustee (RS) 3801 University Avenue, Suite 720

Vonage 101 Crawfords Corner Road Ste 2416 Wembo, Armand 2660 S Pitkin Way Aurora, CO 80013-1556

3801 University Avenue, Suit Riverside, CA 92501-3255

Holmdel, NJ 07733-1980

Wilson, Ashley Jean 43542 Kirkland Ave #285

Lancaster, CA 93535-6607

Wyche, Seitu 16352 Pebble Beach Dr Apt 112

Apt 112 Victorville, CA 92395-4465 Charles W Daff (TR) 100 Spectrum Center Drive Suite 600

Irvine, CA 92618-4969

(p)MICHAEL G SPECTOR ESQ ATTN LAW OFFICES OF MICHAEL G SPECTOR 2122 N BROADWAY SANTA ANA CA 92706-2614

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Michael G Spector Law Offices of Michael G. Spector 2122 N. Broadway Santa Ana, CA 92706

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) State Board of Equalization

(u) Catherine Thomas

(u) Charles Dimick

End of Label Matrix

Mailable recipients 66

Bypassed recipients

Total

3 69